



STATE OF MAINE
Cumberland, SS

SUPERIOR COURT
CIVIL ACTION
DOCKET NO.: PORSC-CV-2015-

FEROZ SAYED,
of Portland, County of
Cumberland, State of Maine
Plaintiff

VS.

COMPLAINT

WAL-MART STORES EAST, INC.,
a foreign corporation doing business in
Scarborough, County of Cumberland,
State of Maine,

Defendant

NOW COMES the Plaintiff, by and through him attorneys, and complains against
the Defendant as follows:

COUNT I

1. Plaintiff Feroz Sayed is a resident of Portland, County of Cumberland, State of Maine.
2. Defendant Wal-Mart Stores East, Inc. is a foreign corporation doing business in Scarborough, County of Cumberland, State of Maine
3. On or about January 1st, Plaintiff Feroz Sayed was lawfully on the premises at certain real property owned and occupied by Defendant, in Scarborough, County of Cumberland, State of Maine.
4. At said time and place, Defendant owed Plaintiff Feroz Sayed the duty to properly maintain said property.
5. As a direct and proximate result of the negligence of the Defendant's agent, servant or employee aforesaid, while the Plaintiff was securing his infant son in a shopping cart, an employee was moving carts and rammed a line of carts into the plaintiff's person, causing serious injuries to his back and otherwise greatly injuring the plaintiff in mind and body.
6. Said injuries caused great pain and suffering and mental anguish to Plaintiff requiring hospitalization and medical treatment for which Plaintiff is liable financially, have caused him loss of enjoyment of life, loss of earnings, and loss of earning capacity, all of which elements of damage are of a continuing nature since the injuries are permanent in their effects.

WHEREFORE, Plaintiff Feroz Sayed prays judgment that is reasonable against the Defendant Wal-Mart Stores East, Inc. on this Count I, plus interests and costs.

COUNT II

7. Plaintiff repeats and realleges the allegations contained in Paragraphs 1 through 6 and incorporates the same herein by reference.

8. Defendant owed Plaintiff the duty of exercising reasonable care to provide premises which he was invited to use or which he could be reasonably expected to use, that were reasonably safe for his use.

9. Defendant breached its said duty to provide reasonably safe premises, as a direct and proximate result of which Plaintiff Feroz Sayed sustained the aforesaid serious injuries.

WHEREFORE, Plaintiff Feroz Sayed prays judgment that is reasonable against the Defendant Wal-Mart Stores East, Inc. this Count II, plus interest and costs.

DATED at Lewiston, Maine, this 17 day of February, 2015.



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